

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

ULTIMA SERVICES CORPORATION, )  
                                  )  
Plaintiff,                    )  
                                  )  
v.                             ) No. 2:20-cv-00041-DCLC-CRW  
                                  )  
U.S. DEPARTMENT OF AGRICULTURE, )  
et al.,                        )  
                                  )  
Defendants.                   )

**JOINT MOTION FOR PROTECTIVE ORDER**

Plaintiff Ultima Services Corporation and Defendants United States Department of Agriculture, the Secretary of Agriculture, the United States Small Business Administration, and the Administrator of the United States Small Business Administration (“the Parties”) jointly, by their attorneys, request that the court enter the attached Stipulated Confidentiality and Protective Order in the above-captioned case.

In support of this motion, the Parties state as follows:

1.     In order to comply with the disclosure and discovery obligations in the Federal Rules of Civil Procedure and Local Rules, the Parties may need to disclose certain confidential information, such as personally identifiable information and income tax returns.
2.     Defendants may also need to disclose commercial or financial information that they obtained from companies, including Plaintiff and its competitors, on a privileged or confidential basis.

3. Further, federal law requires Defendants to maintain the secrecy of proprietary information provided to it by prospective and current contractors. *See* 48 C.F.R. § 27.402.

4. The Parties agree to the entry of a confidentiality and protective order pursuant to Rule 26(c).

5. A proposed Stipulated Confidentiality and Protective Order is attached.

THEREFORE, the Parties request that the Court enter the attached proposed Stipulated Confidentiality and Protective Order.

Dated: June 9, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2021, I electronically filed the above document and attached Stipulated Confidentiality and Protective Order with the Clerk of the Court using the ECF System, which will send notification of such filing to all counsel of record.

*/s/ Juliet E. Gray*  
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